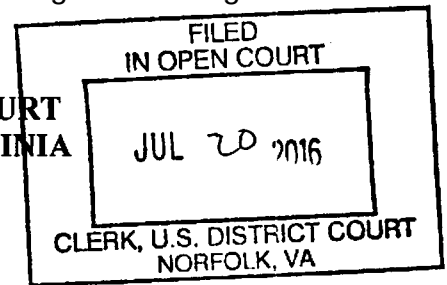


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**



UNITED STATES OF AMERICA

v.

JOSEPH JESUS GRULLON,

Defendant.

UNDER SEAL

CRIMINAL NO. 2:16cr 101

**21 U.S.C. § 841(a)(1)
Aid and Abet the Distribution of Cocaine
(Count 1)**

**21 U.S.C. § 843(b)
Using Communication Facilities to Cause,
Commit, and Facilitate Felony Violations
of the Controlled Substances Act
(Counts 2 and 3)**

**18 U.S.C. § 924(d); 21 U.S.C. § 853;
28 U.S.C. § 2461
Forfeiture Allegation**

INDICTMENT

July 2016 Term - at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about July 15, 2014, in the Eastern District of Virginia, the defendant, JOSEPH JESUS GRULLON, did unlawfully, knowingly and intentionally distribute, and did aid and abet the distribution of, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.)

COUNTS TWO AND THREE

On or about the dates and times set forth below, in the Eastern District of Virginia, the defendant, JOSEPH JESUS GRULLON, charged in the counts set forth below, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone, in causing, committing and facilitating the commission of an act constituting a felony violation of Title 21 of the United States Code, including but not limited to, distribution of cocaine, in violation of Title 21 of the United States Code § 841, as charged in this Indictment.

Count	Date	Time	Communication Facility Used	Call Session
2	July 15, 2014	15:17	757-319-5471 757-323-7361	461
3	July 15, 2014	23:02	757-319-5471 757-323-7361	480

(All in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendant, if convicted of any of the violations alleged in this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
 - a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation;
 - b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation; and
 - c. Any firearm or ammunition used in or involved in the violation.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(All in accordance with Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

United States v. Joseph Jesus Grullon,
Criminal No. 2:16cr 101

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this page has been filed
with the Clerk's Office.

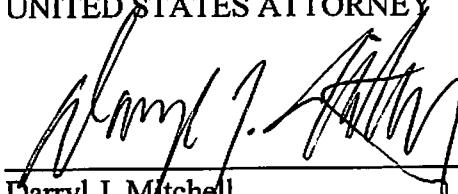
A TRUE BILL:

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with the Clerk's Office.

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



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